



Montana Department of  
**ENVIRONMENTAL QUALITY**

Marc Racicot, Governor

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December 27, 1999

Steve Wright  
Columbia Falls Aluminum Company, LLC  
2000 Aluminum Drive  
Columbia Falls, Montana 59921

Dear Mr. Wright:

Air Quality Permit # 2655-05 is deemed final as of December 26, 1999 by the Department of Environmental Quality. This permit is for change of ownership. All conditions of the department's decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the department,

Pat Driscoll, Acting  
Air Permitting Section Supervisor  
Air & Waste Management Bureau  
(406) 444-3490

PD: bjd

Enclosure

Montana Department of Environmental Quality  
Permitting and Compliance Division

Air Quality Permit # 2655-05

Columbia Falls Aluminum Company, LLC  
2000 Aluminum Drive  
Columbia Falls, Montana 59921

December 26, 1999



## AIR QUALITY PERMIT

Issued To: Columbia Falls Aluminum Company LLC	Permit #:	2655-05
2000 Aluminum Drive	AFS #:	029-0012
Columbia Falls, MT 59921	Modification Request Received:	11/10/99
	Department Decision on Mod:	12/10/99
	Final Permit Issued:	12/26/99

An air quality permit, with conditions, is hereby granted to the above-named permittee, hereinafter referred to as "CFAC," pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.701, *et seq.*, as amended, for the following:

### SECTION I: Permitted Facilities

- A. Columbia Falls Aluminum Company, L.L.C. (CFAC) currently operates a primary aluminum smelter in the city of Columbia Falls, NE¼, SE¼, Section 3, Township 30 North, Range 30 West, Flathead County.

- B. Permitted Equipment

This permit covers all existing air pollution sources and control equipment at the facility. A list of sources for which preconstruction permits were issued is contained in the permit analysis.

- C. Proposed Action

The proposed permit modification will transfer ownership of Columbia Falls Aluminum Company (CFAC) to Glencore AG. The facility will be renamed Columbia Falls Aluminum Company, LLC, and will be referred to as "CFAC" within this permit. The Department of Environmental Quality (Department) acknowledged the change of ownership in a letter to CFAC dated June 22, 1999.

### SECTION II: Limitations and Conditions

- A. Emission Limitations and Control Requirements

1. CFAC shall not cause or allow the emission of any gasses which contain total fluoride emissions in excess of 2.6 lbs/ton of aluminum produced, averaged over any calendar month (ARM 17.8.331).
2. CFAC shall not cause or authorize emissions from any potroom group which exhibit an opacity of 10 percent or greater (ARM 17.8.332).
3. Particulate emissions from the East and West alumina unloading hopper and air slide area shall be controlled with baghouses (ARM 17.8.710).

4. Particulate emissions from the west conveyor storage silo baghouse, coke and coal distribution baghouse, and paste plant Draco dust control system shall be limited to a maximum of 0.02 gr/dscf (ARM 17.8.715).
5. Visible emissions from the west conveyor storage silo baghouse, the coke and coal distribution baghouse, and the paste plant Draco dust control system shall not exceed 20 percent opacity (ARM 17.8.304).
6. CFAC shall operate and maintain a dry coke scrubber to control emissions from the paste plant mixers and extruder (40 CFR 63 Subpart LL, ARM 17.8.342 and ARM 17.8.710).
7. Visible emissions from the paste plant mixer stack shall not exceed 40 percent opacity (ARM 17.8.304).
8. Particulate emissions from the fugitive alumina recycle system baghouse shall not exceed 0.02 gr/dscf (ARM 17.8.715).
9. Visible emissions from the fugitive alumina recycle dust control system baghouse shall be limited to 20 percent opacity (ARM 17.8.304).
10. Particulate emissions from the TAC baghouse shall not exceed 0.02 gr/dscf (ARM 17.8.715).
11. Visible emissions from the TAC baghouse shall be limited to 20 percent opacity (ARM 17.8.304).
12. CFAC shall not cause or authorize the production, handling, transportation or storage of any material unless reasonable precautions to control airborne particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20 percent or greater averaged over six consecutive minutes, except for emissions of airborne particulate matter originating from any transfer of molten metal which was installed or in operation prior to November 23, 1968 (ARM 17.8.308).
13. CFAC shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
14. CFAC shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, installed on or before November 23, 1968, that exhibit an opacity of 40 percent or greater averaged over six consecutive minutes. This section does not apply to the transfer of molten metals or emissions from transfer ladles (ARM 17.8.304).
15. CFAC shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, installed after November 23, 1968, that exhibit an opacity of 20 percent or greater averaged over six consecutive minutes (ARM 17.8.304).

16. Particulate emissions from the fabric filter controlling the pin cleaning machine shall not exceed 0.02 gr/dscf (ARM 17.8.715).

B. Emission Testing

1. CFAC shall conduct an initial performance test for opacity and demonstrate compliance with the limitation contained in Section II.A.14 on the East and West Alumina Unloading baghouses within 180 days of startup of the new pulsejet baghouse. The testing and compliance demonstration shall continue on an every-two-year basis (ARM 17.8.105).
2. Source tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.710).
3. The department may require further testing (ARM 17.8.105)

C. Monitoring Requirements

1. CFAC shall install, operate, calibrate and maintain a parameter monitoring system for the paste plant dry coke scrubber. The monitoring system shall conform to the requirements of 40 CFR 63.848(f) and shall be submitted to the Department for approval within 180 days after startup of the scrubber.
2. CFAC shall install and maintain a magnehelix or other device capable of measuring the pressure drop across the TAC baghouse, the fugitive alumina recycle baghouse, the east alumina elevator baghouse and the west conveyor storage baghouse.

D. Operational & Emission Inventory Reporting Requirements

1. CFAC shall maintain a log of the pressure drop measurements required by II(C)(2) above. The pressure measurements shall be recorded on a daily basis when the systems are in operation. These logs shall be made available for review by department personnel upon request.
2. CFAC shall submit a quarterly emissions report to the department. The report shall be in a format and contain reporting parameters as requested by the department. The report shall be submitted no later than 45 days following the end of the calendar quarter being reported.
3. CFAC shall supply the department with annual production information for all emission points, as required by the department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis and sources identified in Section I of this permit.

Production information shall be gathered on a calendar-year basis and submitted to the department by the date required in the emission inventory request. Information shall be in the units as required by the department (ARM 17.8.505).

4. CFAC shall notify the department of any construction or improvement project conducted pursuant to ARM 17.8.705(1)(r) that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or that would result in an increase in source capacity above its permitted operation or the addition of a new emissions unit. The notice must be submitted to the department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.705(1)(r)(iv) (ARM 17.8.705).
5. All records compiled in accordance with this permit must be maintained by CFAC as a permanent business record for at least five years following the date of the measurement, must be available at the plant site for inspection by the department, and must be submitted to the department upon request (ARM 17.8.710).

E. Ambient Monitoring Plan

CFAC shall conduct vegetation sampling for fluoride-in-forage as described in Attachment 1.

Section III: General Conditions

- A. Inspection - The recipient shall allow the department's representatives access to the source at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver - The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if the recipient fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving the permittee of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.701, et seq. (ARM 17.8.717).
- D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401, et seq., MCA.

- E. Appeals - Any person or persons jointly or severally adversely affected by the department's decision may request, within fifteen (15) days after the department renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the Board of Environmental Review. A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The department's decision on the application is not final unless fifteen (15) days have elapsed and there is no request for a hearing under this section. The filing of a request for a hearing postpones the effective date of the department's decision until the conclusion of the hearing and issuance of a final decision by the Board of Environmental Review.
- F. Permit Inspection - As required by ARM 17.8.716 Inspection of Permit, a copy of the air quality permit shall be made available for inspection by air quality personnel at the location of the permitted source.
- G. Construction Commencement - Construction must begin within three years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked.
- H. Permit Fees - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay by the permittee of an annual operation fee may be grounds for revocation of this permit, as required by that Section and rules adopted thereunder by the Board of Environmental Review.

Attachment 1

AMBIENT AIR MONITORING PLAN  
COLUMBIA FALLS ALUMINUM COMPANY LLC

1. This ambient air monitoring plan is required by air quality permit #2655-05 which applies to the Columbia Falls Aluminum Company (CFAC) primary aluminum reduction plant near Columbia Falls. This monitoring plan may be modified by the department. All requirements of this plan are considered conditions of the permit.
2. CFAC shall collect vegetation samples for fluoride-in-forage analysis at three air monitoring sites in the vicinity of their plant and facilities. The exact locations of the monitoring sites must be approved by the department and meet all the siting requirements contained in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; Parts 53 and 58 of the Code of Federal Regulations; and ARM 17.8.230, or any other requirements specified by the department.
3. CFAC shall continue vegetation sampling for at least one year following issuance of this permit. The air monitoring data will be reviewed by the department and the department will determine if continued monitoring or additional monitoring is warranted. The department may require continued vegetation sampling to track long-term impacts of emissions from the facility or require additional vegetation sampling, ambient air monitoring or analyses if any changes take place in regard to quality and/or quantity of emissions or the area of impact from the emissions.
4. CFAC shall monitor the following parameters at the sites and frequencies described below:

AIRS # and Site Name	UTM <sup>1</sup> Coordinates	Parameter	Frequency
30-029-0707 Doane	Zone 12 N 5365419 E 710886	Fluoride in Vegetation	As required by ARM 17.8.230
30-029-0708 Hoffman	Zone 12 N 5362152 E 713305	Fluoride in Vegetation	As required by ARM 17.8.230
30-029-0710 New Liddle	Zone 12 N 5360573 E 711411	Fluoride in Vegetation	As required by ARM 17.8.230
<sup>1</sup> UTM = Universal Transverse Mercator			

5. Data recovery for all parameters shall be at least 80 percent computed on a quarterly and annual basis. The department may require continued monitoring if this condition is not met.
6. Any vegetation sampling or ambient air monitoring changes proposed by CFAC must be approved in writing by the department.

7. CFAC shall utilize air monitoring and quality assurance procedures which are equal to or exceed the requirements described in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; 40 CFR Parts 53 and 58 of the Code of Federal Regulations; and ARM 17.8.230, or any other requirements specified by the department.
8. CFAC shall submit an annual data report by March 1 of each year. The annual report shall consist of a narrative data summary and a data submittal of all data points on AIRS formatted paper input forms, disks or magnetic tapes which are compatible with the department's computer system. The narrative data summary shall include:
  - a. A topographic map of appropriate scale with UTM coordinates and a true north arrow showing the vegetation sampling and air monitoring site locations in relation to the plant and the general area;
  - b. A hard copy of the individual data points;
  - c. A summary of the data collection efficiency;
  - d. A summary of the reasons for missing data;
  - e. A summary of any fluoride-in-forage standard exceedances; and
9. The department may audit, or may require CFAC to contract with an independent firm to audit, the vegetation sampling network, the laboratory performing associated analyses, and any data handling procedures at unspecified times. On the basis of the audits and subsequent reports, the department may recommend or require changes in the vegetation sampling network and associated activities in order to improve precision, accuracy and data completeness.

Permit Application Analysis  
Columbia Falls Aluminum Company LLC  
Air Quality Permit #2655-05

I. Introduction/Process Description

A. Process Description

Columbia Falls Aluminum Company LLC (CFAC) currently operates a primary aluminum smelter located in Columbia Falls at SE¼, NE¼ of Section 3, Township 30 North, Range 20 West of Flathead County. The facility includes the following sources:

1. Aluminum reduction facilities (Sumitomo Modified Vertical Stud Soderberg reduction cell with an Alcoa a-398 dry scrubbing primary gas collection system) consisting of 10 potrooms with 60 pots per room (600 reduction cells total).
2. West and East alumina unloader baghouses.
3. Coke unloading, handling and storage facilities.
4. Alumina storage building and associated ore handling equipment. This unit was intended for temporary use when permitted and is no longer being used for alumina storage. This permit will be revoked at the request of CFAC.
5. West conveyor storage silo, coke and coal distribution system and paste plant Draco dust control system.
6. Paste plant mixer stack scrubber.
7. Alumina recycle baghouse.
8. Treatment of Aluminum in Crucibles (TAC) baghouse.

B. Permit History

The aluminum smelter was constructed prior to 1968 and has been operated as an existing source since that time. The facility processes alumina ore using electrolytic reduction cells to produce aluminum ingots. CFAC has been issued eight previous permits from 1976 to 1990. A description of these previous permits is as follows:

Permit #972 was issued on July 16, 1976 for the installation of a dry scrubbing system - Sumitomo Soderberg process to control emissions from the reduction cells.

Permit #1615 was issued on June 25, 1981 for the conversion of the unloader baghouses controlling the #1 and #2 alumina unloading systems from shaker type baghouses to pulsejet baghouses.

Permit #1620 was issued on September 24, 1981 for the installation of a baghouse to control emissions from the coke unloading area.

Permit #1672 was issued on April 20, 1982 for the construction of a new aluminum casting facility. The facility was never constructed and the permit will be revoked.

Permit #1688 was issued on July 1, 1982 for the construction of a temporary alumina storage building and the associated alumina transfer operation. The transfer operation has been completed and the building is currently being used for other purposes and CFAC has no intentions of using it to store alumina in this manner again. This permit will be revoked.

Permit #1820 was issued on October 21, 1983 for the installation of the west conveyor storage silo baghouse, the coke and coal distribution baghouse, and the paste plant Draco dust control system.

Permit #2568 was issued on April 10, 1989 for the installation of a wet scrubber to control emissions from the paste plant area.

Permit #2655 was issued on December 13, 1990 for the installation of an alumina recycle baghouse and a baghouse to control emissions from the Treatment of Aluminum in Crucibles (TAC) system.

Permit Alteration #2655-01 was issued on March 3, 1996 for the conversion of the existing *west conveyor storage baghouse* in the west alumina unloader station and the *bucket elevator baghouse* in the east alumina unloader system from shaker-type baghouses to pulse-jet baghouses. The *west conveyor storage baghouse* will also be relocated from silo #2 to silo #3.

Also included in this permitting action is a system name change. The #1 and #2 *alumina unloading systems* referred to in permit #1615 are actually the *west and east alumina unloader baghouses*, respectively. These baghouses were authorized to be modified from shaker-type baghouses to pulsejet baghouses by permit #1615. A more complete description of the unloader station control systems is contained in the analysis for permit #2655-01.

Permit #2655-02, issued on July 5, 1997, authorized the replacement of the existing anode pin cleaning machine with a new machine which will clean ten anode pins at a time. The cleaning system consists of a shotblasting machine for the removal of scale from the anode pins. Particulate emissions from the system are controlled with a cartridge-type fabric filter. Emissions from the filter will be exhausted inside the pin cleaning room.

Emissions from the facility are expected to decrease from the pin cleaning machine replacement. Because the system will vent inside the pin cleaning room, a decrease in the particulate exhausted to atmosphere is anticipated. The existing system currently exhausts directly to atmosphere.

After issuance of the department's preliminary determination, CFAC requested that the west alumina elevator baghouse identified in Section II.C.1 of the permit be changed to the west conveyor storage baghouse to be consistent with the changes made in permit #2655-01.

On June 27, 1996 CFAC submitted a permit application to modify the paste plant anode dust control system. This application was given number **2655-03**. Based on the soon to be issued de minimis rule - ARM 17.8.705(1)(q), this project would not require a permit to be issued. CFAC determined that construction would not commence until after the rule was promulgated and withdrew the application. Therefore, permit **#2655-03** was never issued.

Permit **2655-04** allowed CFAC to replace the existing wet scrubber on the paste plant mixers with a dry coke pitch fume scrubber for the control of particulates and polycyclic organic matter (POM). The dry scrubber is required by 40 CFR Part 63 Subpart LL - National Emission Standards for Hazardous Air Pollutants for Primary Aluminum Smelters. The new dry scrubber also controlled emissions from the extruders, which is currently uncontrolled.

The emissions from the mixers and extruders are collected with hoods and routed to a venturi reactor where coke fines are injected. The pitch fume binds with the coke particles and is then collected with a pulsejet baghouse. After collection, the solids are returned to the paste plant production system and used as coke in the manufacture of anode briquettes.

Permit 2655-04 allowed the replacement of the wet scrubber, and also allowed the routing of a previously uncontrolled source, with a new dry scrubber. The new dry scrubber significantly decreased the emissions of both particulate and POM from the paste plant.

Permit 2655-04 also changed Attachment 1 to remove reporting parameters no longer needed by the department. The deadline to submit CFAC's annual fluoride-in-forage data was also changed from February 1 to March 1, and the rule references in the permit were also updated to correspond with the newly recodified Air Quality Rules.

### C. Current Permitting Action

The proposed permit modification will transfer ownership of Columbia Falls Aluminum Company (CFAC) to Glencore AG. The facility will be renamed Columbia Falls Aluminum Company LLC, and will be referred to as "CFAC" within this permit. CFAC informed the department of the ownership change in a letter dated April 16, 1999, and again in a fax transmittal dated May 26, 1999. The last communication indicated that the change of ownership would occur no later than June 1, 1999. The Department of Environmental Quality

acknowledged the change of ownership in a letter to CFAC dated June 22, 1999. Permit #2655-05 will replace permit #2655-04.

D. Additional information

Additional information, such as applicable rules and regulations, BACT determinations, air quality impacts and environmental assessments, are included in the analysis associated with each permit.

II. Applicable Rules and Regulations

The following are partial quotations of some applicable rules and regulations which apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available upon request from the department. Upon request, the department will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1, General Provisions, including but not limited to:

1. ARM 17.8.104, Testing Requirements. Any person or persons responsible for the emissions of any air contaminant into the outdoor atmosphere shall, upon written request of the department, provide the facilities and necessary equipment, including instruments and sensing devices, and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the department.
2. ARM 17.8.105, Source Testing Protocol. CFAC shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual.
3. ARM 17.8.110, Malfunctions. (2) The department must be notified promptly by phone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation, or to continue for a period greater than 4 hours.
4. ARM 17.8.111, Circumvention. (1) No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant which would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner that a public nuisance is created.

B. ARM 17.8, Subchapter 2 Ambient Air Quality, including, but not limited to:

ARM 17.8.210, Ambient Air Quality Standards for Sulfur Dioxide,  
ARM 17.8.211, Ambient Air Quality Standards for Nitrogen Dioxide,  
ARM 17.8.212, Ambient Air Quality Standards for Carbon Monoxide,  
ARM 17.8.213, Ambient Air Quality Standard for Ozone,  
ARM 17.8.214, Ambient Air Quality Standard for Hydrogen Sulfide,

ARM 17.8.220, Ambient Air Quality Standard for Settled Particulate Matter,  
ARM 17.8.221, Ambient Air Quality Standard for Visibility,  
ARM 17.8.222, Ambient Air Quality Standard for Lead,  
ARM 17.8.223, Ambient Air Quality Standard for PM<sub>10</sub>, and  
ARM 17.8.230, Fluoride in Forage,

CFAC must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 Emission Standards, including, but not limited to:

1. ARM 17.8.304, Visible Air Contaminants. This section requires an opacity limitation of 20% from all sources installed since November 23, 1968.
2. ARM 17.8.308, Particulate Matter, Airborne. This section requires reasonable precautions for fugitive emission sources and Reasonably Available Control Technology (RACT) for existing fugitive sources located in a nonattainment area.
3. ARM 17.8.309, Particulate Matter, Fuel Burning Equipment. This section requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
4. ARM 17.8.310, Particulate Matter, Industrial Process. This section requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
5. ARM 17.8.340, Standard of Performance for New Stationary Sources. This section incorporates by reference 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS) including, but not limited to:

Subpart S - Standards of Performance for Primary Aluminum Reduction Plants. CFAC does not contain affected facilities under this subpart because none of the facilities mentioned in the subpart were constructed or modified after October 23, 1974.

D. ARM 17.8. Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees, including, but not limited to:

1. ARM 17.8.505, Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the department; and the air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

The annual assessment and collection of the air quality operation fee, as described above, shall take place on a calendar-year basis. The department may insert into any final permit issued after the effective date of these rules such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions which prorate the required fee amount.

E. ARM 17.8, Subchapter 7, Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.704, General Procedures for Air Quality Preconstruction Permitting. This air quality preconstruction permit contains requirements and conditions applicable to both construction and subsequent use of the permitted equipment.
2. ARM 17.8.710, Conditions for Issuance of Permit. This section requires that CFAC demonstrate compliance with applicable rules and standards before a permit can be issued. CFAC has demonstrated compliance with applicable rules and standards as required for permit issuance
3. ARM 17.8.716, Inspection of Permit. This requires that air quality permits shall be made available for inspection by the department at the location of the source.
4. ARM 17.8.717, Compliance with Other Statutes and Rules. This rule states that nothing in the permit shall be construed as relieving CFAC of the responsibility for complying with any applicable federal and Montana statutes, rules and standards, except as specifically provided in ARM 17.8.101, *et seq.*
5. ARM 17.8.731, Duration of Permit. This section states that an air quality permit is valid until revoked or modified except that a permit may contain a condition providing that the permit will expire unless construction is commenced within a specified time frame. This time frame may not be less than one year.
6. ARM 17.8.733, Modification of Permit. An air quality permit may be modified for changes in any applicable rules and standards adopted by the board or changed conditions of operation at a source or stack which do not result in an increase in emissions because of those changed conditions. A source may not increase its emissions beyond those found in its permit, unless the source applies for and receives another permit.

F. ARM 17.8, Subchapter 8, Prevention of Significant Deterioration of Air Quality (PSD), including, but not limited to:

ARM 17.8.801, Definitions. This facility is a listed source, and emissions are greater than 100 tons/year, therefore the facility is major. This proposal is not considered a major modification because a decrease in emissions will result. Therefore, review under the PSD program is not required.

- G. ARM 17.8, Subchapter 10, Preconstruction Permit Requirements for Major Stationary Sources or Major Modifications Located Within Attainment or Unclassified Areas, including, but not limited to:

ARM 17.8.1004, When Air Quality Preconstruction Permit Required. This proposal is not considered a major modification; therefore the requirements of this subchapter do not apply.

IV. Emissions Inventory

This modification does not allow an increase in permit emissions, and an emission inventory was not conducted for this permitting action. A complete facility emission inventory is available from the department.

V. Existing Air Quality

The CFAC facility is located adjacent to the Columbia Falls PM10 non-attainment area; however, the plant has not been shown to impact the non-attainment area.

VI. Air Quality Impacts

There will be no change in emissions as a result of this permitting action.

VII. Takings or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the department has conducted a private property taking and damaging assessment and has determined there are no taking or damaging implications.

VIII. Environmental Assessment

This permitting action does not allow an increase in permitted emissions, and no change in the amount of emissions from the facility is anticipated as a result of the change of ownership. Therefore, because this permit modification is considered an administrative action, an environmental assessment is not required.

Analysis Prepared by: Jack Dartman

Date: December 6, 1999